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Counsel to American Financial Center, Inc. dba Ocean Capital Factors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

In re:

HPE Transportation LLC,

Debtor.

)
) Chapter 11
)

) Case No. 21-50650-FJS
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)
)

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia, Jae Won Ha (“**Movant**”) respectfully moves for the admission of Lori E. Eropkin (the “**Proposed Admittee**”) to appear *pro hac vice* in the above-captioned case as counsel on behalf of American Financial Center, Inc. dba Ocean Capital Factors (the “**Motion**”). In support of the Motion, as demonstrated by the attached application of the Proposed Admittee, the Movant respectfully states as follows:

1. Ms. Eropkin is a member in good standing of the Bars of the State of California and Oklahoma.

2. Ms. Eropkin is admitted to practice in the following federal courts: United States District Court for the Eastern District of California, United State District Court for the Central District of California, United States District Court for the Eastern District of Oklahoma, and the United States District Court for the Western District of Oklahoma.

3. Ms. Eropkin has never been disbarred, suspended, or denied admission to practice.

4. Ms. Eropkin understands that if she is admitted *pro hac vice* to practice before this Court, she will be subject to the disciplinary jurisdiction of this Court.

5. A copy of Ms. Eropkin's written application as required by Local Bankruptcy Rule 2090-1(E)(3) is attached hereto as Exhibit A and incorporated herein by reference.

6. Co-counsel for the Proposed Admittee in this proceeding will be the undersigned, who has been formally admitted to the bar of this Court. As co-counsel, the undersigned will comply with all requirements of Rule 2090 of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia.

7. Notice of this Motion is being provided to all parties via CM/ECF. Due to the administrative nature of the Motion, Movant submits that no further notice is required.

WHEREFORE, Movant respectfully requests that the Court approve the admission of Lori E. Eropkin in the above-captioned case as counsel for American Financial Center, Inc. dba Ocean Capital Factors.

Dated: August 24, 2021

Respectfully submitted,

/s/ Jae Won Ha

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CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2021, a copy of the foregoing Motion was filed and served via the Court's Electronic Case Filing System on all parties receiving such notification.

/s/ Jae Won Ha

Counsel